

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)
Plaintiff,) Civil Action No. 05-cv-374
)
v.)
)
NABSTAR, LLC d/b/a SLEEP INN)
)
Defendant.)

**STIPULATION TO REQUEST AN
EXTENSION OF DISCOVERY**

Plaintiff, EEOC, by and through its counsel, Rachel M. Smith, and Defendant, Nabstar, LLC, by and through its counsel, Kevin J. Connors, Esq., agree and stipulate to the following request:

That the dispositive motion filing deadline of March 15, 2006 be extended for a period of **30 days to April 14, 2006** for the reasons set forth below:

1. The deposition of Islyn Palmer, Charging Party, is pending for March 17, 2006.
2. The depositions of at least two third party witnesses are pending tentatively for March 20, 2006.
3. A need for further discovery beyond the original dispositive motion deadline of March 15, 2006 is necessary in order to gather the required information to file a dispositive motion in this matter.

Respectfully submitted,

/s/ Kevin J. Connors
Kevin J. Connors, Esq.
Marshall Dennehey Warner Coleman & Goggin
1220 Market Street 5th Floor
Wilmington, DE 19801

/s/ Rachel M. Smith
RACHEL M. SMITH,
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Defendant.)

ORDER

AND NOW, this ____ day of _____, 2006, upon consideration of the
Stipulation to Request an Extension of Dispositive Motion deadline by both parties, it is hereby
ORDERED:

That the Stipulation to Request an Extension of Dispositive Motion deadline by 30 days
to April 14, 2006 is HEREBY GRANTED.

BY THE COURT:

HON. GREGORY M. SLEET
UNITED STATES DISTRICT JUDGE